

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DENISE KREKSTEIN AS TRUSTEE FOR THE RITA GETZ FELDMAN TRUST, Plaintiff, v. MCDONALD’S CORPORATION, Defendant.	No. 2:20-cv-5770-CMR
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STIPULATION AND ORDER

IT IS HEREBY STIPULATED by plaintiff Denise Krekstein as Trustee for the Rita Getz Feldman Trust (“Plaintiff”), and defendant McDonald’s Corporation (“Defendant”), through their respective undersigned counsel, that the deadlines contained in the Court’s Scheduling Order issued on August 24, 2021, shall be modified as follows:¹

1. Fact discovery shall be completed on or before **April 15, 2022.**
2. Expert reports shall be exchanged on or before **April 30, 2022.**
3. Rebuttal expert reports shall be exchanged on or before **May 31, 2022.**
4. All expert discovery to be completed on or before **June 15, 2022.**
5. All dispositive motions shall be filed on or before **June 15, 2022.**
6. The settlement conference presently scheduled before Magistrate Judge Carol Sandra Moore Wells on January 6, 2022, at 10:00 a.m. is **ADJOURNED.** The

¹ The parties have agreed to and respectfully request that the case management deadlines be extended by approximately seventy-five (75) days. Although the parties have worked diligently over the past few months to progress in discovery, significant additional discovery remains outstanding including a Rule 34 request to forensically inspect and test evidence, which the parties anticipate may involve motions practice.

parties shall contact Magistrate Judge Wells to schedule a settlement conference at a time and date convenient to Magistrate Judge Wells in **April or May 2022**.

BRAVERMAN KASKEY GARBER

/s/ Benjamin A. Garber

BENJAMIN A. GARBER

*Counsel for Plaintiff Denise Krekstein as
Trustee for the Rita Getz Feldman Trust*

BUCHANAN INGERSOLL & ROONEY

/s/ Craig D. Mills

CRAIG D. MILLS

*Counsel for Defendant McDonald's
Corporation*

SO ORDERED:

/s/ Cynthia M. Rufe

CYNTHIA M. RUFÉ, J.

Dated: January 3, 2022